

RECEIVED

MAR 1 1993

DOCKET FILE COPY ORIGINAL

FCC - MAIL ROOM

MIST-BIRKENFELD RURAL FIRE PROTECTION DISTRICT
69500 Banzer Road Mist, OR 97016
(503)755-2710 or (503)755-0510

February 16, 1993

Federal Communications Commission
1919 M. Street, Suite 222
Washington, D.C. 20554

RE: FCC Docket 92-235

Dear Commissioners,

The following comments pertain to Docket 92-235. Please consider them before making a final decision on the changes this docket would mandate.

First, let me introduce my department. Mist-Birkenfeld RFPD is a small rural fire district serving less than 1000 people who are spread out over more than 135 square miles. Understandably with a small population base, our funding is very limited. With that limited funding we are providing fire suppression, emergency medical services, and a search & rescue program. We do this with well trained and dedicated Volunteers.

Topographically, our district is located in the Coast Range mountains in north-west Oregon. Communications are difficult at best in this area. Only 4 years ago we obtained funding to upgrade our radio system so that we have marginally adequate coverage.

The impact of the changes mandated by Docket 92-235 will be catastrophic for this district. Because of our terrain, any change in system strength for height will take us back fifteen years. At that time, only the apparatus had radios that would reach dispatch, and then only if you were in the right place. Volunteers were reached by "fire phone"...if they were at home. For small rural districts like us the proposed changes spell disaster.

No. of Copies rec'd
List A B C D E

0+12

RECEIVED

MAR 1 1993

FCC - MAIL ROOM

DOCKET 92-235

Page 2

The second area which presents a problem is funding. Assuming that the technology is available at the time when this docket requires upgrading our equipment, how are we to fund the changes? We are talking about \$30,000, minimum, just for our district's portion. That doesn't include the hundreds of thousands of dollars that our dispatching center is going to be required to spend. With measure 5 tax limitations, districts are already being squeezed dry. There are no funds available to make these changes. At least, not in the time frame required.

It is my understanding that technology to implement this proposed mandate is not available and will not be available by the implementation date. It is likely that it will not be possible to comply, even if we did have the funds to do so.

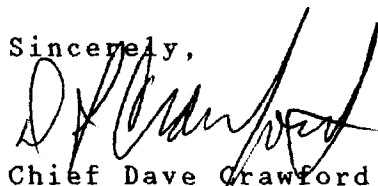
Please understand that we are not opposed to the principles represented in Docket 92-235. They make sense in a general sort of way. However, because in reality each district and agency faces different challenges in resources, terrain and coverage area, hasty implementation of the requirements will cripple some agencies while helping others.

The last comment we have goes to the heart of the matter for most rural districts and agencies. This mandate has no mechanism for funding the required changes. You may find some flush departments to whom \$30,000 is simply a budgeting problem. To many of the rural districts \$30,000 is the budget.

Is it possible that the changes could be made at a slower pace, through attrition. In that way, small departments would have a way to comply. As to coverage, as in our district, there needs to be a way to provide for the problems faced by individual districts. A simple, easy to access waiver system, perhaps.

Thank-you for considering our comments. Please call me at the above numbers if you have questions.

Sincerely,



Chief Dave Crawford